



IND 115 304594

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 12 2012

REPLY TO THE ATTENTION OF:

LR-8J

Mr. George Kioultzopoulos
Environmental Manager
General Motors, LLC
Fort Wayne Assembly Plant
12200 Lafayette Center Road
Roanoke, Indiana 46783

Re: Compliance Evaluation Inspection
EPA ID: IND 115 304 594

Dear Mr. Kioultzopoulos:

On April 24, 2012 a representative of the U.S. Environmental Protection Agency inspected General Motors, LLC's Fort Wayne Assembly Plant (GM or the facility) located in Roanoke, Indiana. The purpose of the inspection was to evaluate GM's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste and Title 329 of the Indiana Administrative Code (329 IAC), Article 3.1. Please find enclosed a copy of the inspection report for your reference.

As of this writing, based upon information available to EPA, our review of the inspection has not resulted in the detection of violations of any of the specific requirements under evaluation. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. EPA and the Indiana Department of Environmental Management will continue to evaluate your facility in the future.

If you have any questions or concerns regarding this letter, please contact Diane Sharrow, of my staff, at (312) 886-6199.

Sincerely,

Gary Victorine, Chief
RCRA Branch

Enclosure

cc: NJohnsto@idem.IN.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

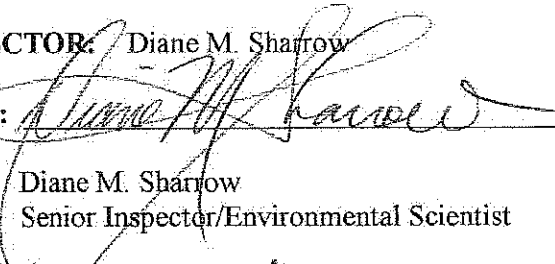
INSTALLATION NAME: General Motors Fort Wayne Assembly Plant

U.S. EPA ID. No.: IND 115 304 594

NAICS CODE: 336112 (Light Truck & Utility Vehicle Manufacturing)
336612 (Heavy Duty Truck Manufacturing)


DATE OF INSPECTION: April 24, 2012

U.S. EPA INSPECTOR: Diane M. Sharrow

PREPARED BY:  05-17-2012
Diane M. Sharrow
Senior Inspector/Environmental Scientist

Date

REVIEWED BY:  05-01-2012

 Lorna M. Jereza, Chief
Compliance Section 1
RCRA Branch

Date

Purpose of Inspection

The purpose of the inspection was to conduct a compliance evaluation inspection (CEI) at the General Motors Fort Wayne Assembly Plant (GM) facility. The CEI was conducted to evaluate GM's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically those regulations related to the management of hazardous waste and used oil.

Background

A CEI to evaluate compliance with certain provisions of the RCRA, specifically those regulations related to the management of hazardous waste, was last conducted at GM by the Indiana Department of Environmental Management (Indiana DEM) on June 3, 2009. GM began construction of the facility in 1984, and operations began at this facility in late 1986. GM notified the United States Environmental Protection Agency (U.S. EPA) of its generation of hazardous waste on or about June 4, 1986. Based on my review of information in the RCRA database (RCRAInfo), GM is currently classified as a large quantity generator (LQG) of hazardous waste.

The GM facility assembles full-size pick-up trucks. The main manufacturing operations include a Body Shop, Paint Shop and General Assembly Area, Wastewater Treatment Plant (WWTP) and Powerhouse. Site-specific operations include the Container Inspection and Storage (CIS) Building, Process Fluids Tank Farm, Reclaim Purge Thinner Storage, Fuel Dispensing Island, Paint Treatment System, Thin Film Tank Farm and Process, Paint Shop Building Paint Mix Room and General Assembly Building Paint Mix Room, Powerhouse / Wastewater Pre-Treatment Plant Outdoor Storage Tanks, Powerhouse / Wastewater Pre-Treatment Plant Chemical Storage Tanks and Wastewater Treatment Sludge.

Opening Conference

I arrived at GM at approximately 1:00 PM. I parked my vehicle and was joined by Said Asgar, an inspector with the Indiana DEM. Mr. Asgar and I entered the facility Administration Building office and approached the security guard at the central desk. We identified ourselves and presented our enforcement credentials. We asked for George Kioultzopoulos, the Environmental Manager. The security guard called Mr. Kioultzopoulos and told us that Mr. Kioultzopoulos said he would join us in a few minutes. The security guard asked us to sign our names and indicate our arrival time on a visitor's log. He also asked us watch a brief program on the Visitor Safety Protocol Program, and he made sure we were in possession of all required safety equipment. He then gave us a green Visitor Safety Protocol "Pass".

After a wait of a few minutes, Mr. Kioultzopoulos and Matt Arbuckle, Senior Environmental Engineer, met us and introduced themselves. We introduced ourselves to Mr. Kioultzopoulos and Mr. Arbuckle, presented our enforcement credentials and explained that the purpose of my visit was to conduct an unannounced CEI at GM that included a Record Review as well as a Visual Site Inspection (VSI).

Mr. Kioultzopoulos and Mr. Arbuckle ensured that we signed in as visitors and understood the Visitor Safety Protocol. They explained that GM facility was not in production for a few weeks as plant work was being done. We then walked to their work area. I asked for a copy of a site plan that we could use during the VSI. I told them that I wished to conduct the VSI first, and then the Record Review. I also informed them both that I would be taking photographs, but would let them know when I was going to take a photograph so they could also take a photograph and / or inform me whether my photograph captured images or information that GM wished to protect by asserting a claim of business confidentiality. Mr. Arbuckle indicated that he would use his cellular telephone camera to take photographs of every item I photographed.

Visual Site Inspection

As Mr. Kioultzopoulos, Mr. Arbuckle, Mr. Asgar and I exited the Administration Building, we proceeded to the General Assembly, where we inspected the Paint Shop hazardous waste satellite accumulation area (see Photographs 1 through 3), the Paint Mix Room, Final Fluids Repair and the hazardous waste satellite accumulation area in Truck Repair (see Photograph 4). We then went outside to the CIS Building located north of the General Assembly Building, where hazardous waste, non-hazardous waste, used oil and electronic waste is stored (see Photographs 5 and 6). Mr. Kioultzopoulos explained that GM is continually looking for ways to reduce and prevent waste and that the facility sends zero waste to landfills. We then proceeded east to the Reclaim Purge Thinner Storage (see Photograph 7). I concluded the VSI at approximately 2:45 PM. I noted no violations during the VSI. We then returned to Mr. Kioultzopoulos and Mr. Arbuckle's work area for the Record Review portion of the CEI.

During the CEI, I took seven (7) photographs with a Nikon Cool pix digital camera, with 8.1 megapixel resolution. These 7 photographs are attached to this inspection report. They are true and representative of the conditions I observed on the date of the CEI, except that the imprinted time on the photographs is two hours earlier than the actual time.

Records Review

During the Record Review, I gave the following documents to Mr. Kioultzopoulos and Mr. Arbuckle: the U.S. EPA OECA Small Business Information Sheet; the U.S. EPA Region 5 List of Pollution Prevention Contacts; and the Indiana Pollution Prevention Brochure.

During the Record Review, I reviewed the waste determination procedures and records; hazardous waste training provided by Waste Management, as well as employee job descriptions for the emergency coordinator and staff in the CIS Building. I noted that training was done as both part of the initial employee orientation as well as on an annual basis. I also reviewed the GM Spill Prevention Control and Countermeasure Plan (SPCC Plan), which serves as GM's RCRA Hazardous Waste Contingency Plan. GM was in the process of adding Mr. Arbuckle to the SPCC Plan as Mr. Kioultzopoulos' second as emergency coordinator. The SPCC contained evacuation plans and procedures and identified spill equipment and location, etc. I also reviewed

records of inspections, the 2011 Annual (Biennial Report), and hazardous waste manifests for the year 2010 through 2012, as well as land disposal restriction forms and certification(s).

Closing Conference

At the end of the CEI, I summarized my findings for Mr. Kioultzopoulos and Mr. Arbuckle. I indicated that I would send a letter to GM, along with the inspection report, checklist and photographs. I concluded the CEI and we returned to the reception area where we initialed our departure time in the Visitor Log with the security guard. We departed GM at approximately 4:00 PM.

ATTACHMENT(S):

Inspection Checklist
Photographs (7)

GM Fort Wayne Assembly

IND 115304594

U.S. EPA Generator Checklist for Indiana

4/11/2011

PART 262: Standards Applicable to Generators of Hazardous Waste

#	40 CFR	NA = Not Applicable, NI = Not Inspected, OK = In Compliance, DF = Deficiency	NA	NI	OK	DF
GENERAL						
1	262.11	Hazardous Waste Determination (characteristic, listed, <u>TCLP</u> , knowledge, exclusions)			✓	
2	262.12(a)	EPA Identification Number (Generator must have ID number)			✓	
3	262.12(c)	Generator must not offer waste to transporters or facilities that have not received ID number.			✓	
THE MANIFEST						
329 IAC 3.1-7/4-6 & 8 & 11			NA	NI	OK	DF
4	262.20	General Requirements (manifest to approved TSD/alt. TSD, SQG reclaim exemption on file)(all required info)			✓	
5	262.21	Manifest Acquisition (generator state 1st, consignment state 2nd)			✓	
6	262.22	Number of Copies (generator, transporters, TSD, & 1 copy returned to generator)			✓	
7	262.23	Manifest Use (signature & date: generator, transporter, TSD, keep copy)			✓	
8	329 IAC 3.1-7-4	Indiana Manifest required for hazardous waste shipped to Indiana TSD Facilities			✓	
9	329 IAC 3.1-7-6	Manifest copies available for review, submitted copies within 5 days after shipping			✓	
PRE-TRANSPORT REQUIREMENTS						
NOTE: If facility treats in < 90 day tanks or containers, see 268.7						
10	262.30, 31, 32, 33	Packaging, Labeling, Marking, Placarding (DOT regulations) (Only apply if waste is in the process of being transported)			✓	
LARGE QUANTITY GENERATORS						
11	262.34(a)	90 Day accumulation limit: Generator may accumulate on-site for 90 days or less provided that:			✓	
12	262.34(a)(1)	Waste is placed in tanks, containers, containment building, or drip pad			✓	
13	262.34(a)(2)	Container marked with start of accumulation date			✓	
14	262.34(a)(3)	Container/tank marked "Hazardous Waste"			✓	
15	262.34(b)	30 Day extension	✓			
SATELLITE CONTAINERS (≥ 12)						
16	262.34(c)(1)	Satellite accumulation (55 gal. maximum or one (1) quart acutely hazardous)			✓	
17	262.34(c)(I)	i) Container must be closed when not in use, in good condition, and compatible with waste			✓	
18	262.34(c)(II)	ii) marked "Hazardous waste" or other words, at or near process and under control of operator			✓	

U.S. EPA Generator Checklist for Indiana

4/11/2011

19	262.34(c)(2)	If exceed 55 gal., container must be marked with accumulation date and must be removed within 3 days			✓	
SMALL QUANTITY GENERATOR			NA	NI	OK	DF
20	262.34(d)(e)(f)	SQG Requirements - 180 days or less (unless transported over 200 miles), quantity of hazardous waste on-site 6000 kg. or less, must follow:	↑			
21	262.34(d)(4)	Containers marked with start of accumulation date and words "Hazardous Waste"	↑			
22	262.34(d)(4)	Must also comply with 265 Subpart C and I. See pages 4 and 5.				
23	262.34(d)(5)	i) Emergency coordinator identified				
24	262.34(d)(5)	ii) Following info posted: emergency coordinator, emergency equipment location, phone numbers				
25	262.34(d)(5)	iii) Employees must be familiar with handling and emergency procedures				
26	262.34(d)(5)	iv) Respond to emergencies	↓			
RECORD KEEPING			NA	NI	OK	DF
27	262.40	RECORD KEEPING (3 yrs. for copy from manifests, TSD, <u>biennial report</u> , exception report, test results, waste analysis/determination, extension time for unresolved enforcement.) <i>Land Disposition Restriction</i>			✓	*
28	262.41	Biennial Report (due March 1 even numbered years) (LQG ONLY)			✓	
29	262.42	Exception Reporting (LQG: >35 days, if no return copy of manifest, contact TSD: >45 days report to IDEM, (SQG: >60 days) transportation report to IDEM)	✓			
30	262.43	Additional Reporting, if required by Commissioner (concerning quantities and disposition of wastes in 40 CFR 261)	✓			
31	262.44	SQG Recordkeeping Requirements (keep records for 3 years: manifests, exceptions, waste determination/analysis)	✓			
EXPORTS			NA	NI	OK	DF
32	262.52	General Requirements (notify EPA, accepted by receiving country, EPA consent)		✓		
33	262.53	Notification of Intent to Export		✓		
34	262.54	Special Manifest Requirements for Primary Exporters		✓		
35	262.55	Exception Reports (>45 days from US departure, >90 days from receipt by foreign source/waste returned to US)		✓		
36	262.56	Annual Reports (March 1 annually for waste: types, quantity, frequency, destination, waste reduction send to EPA)		✓		
37	262.57	RECORD KEEPING (3 years for intent to export, EPA acknowledgments, confirmation of delivery, and annual reports)		✓		
IMPORTS OF HAZARDOUS WASTE			NA	NI	OK	DF
38	262.60	Hazardous Waste Imports (use consignment state's manifest)		✓		

U.S. EPA Generator Checklist for Indiana

4/11/2011

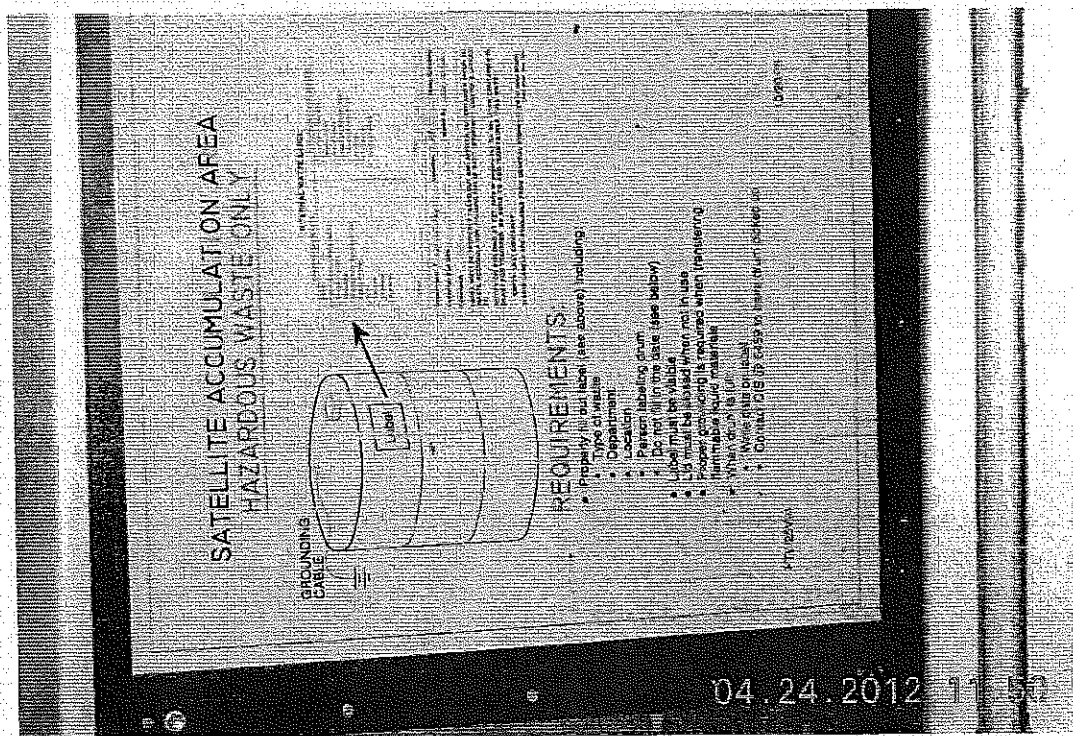
TSD STANDARDS APPLICABLE TO GENERATORS			NA	NI	OK	DF
GENERAL FACILITY STANDARDS (NA for SQG)						
39	262.34 / 265.16(a)	Personnel Training (Program Adequacy) <i>All trained by Waste Mgt.</i>			✓	
40	262.34 / 265.16(b)	Personnel received training within six (6) months <i>On the Job - Matt</i>			✓	
41	262.34 / 265.16(c)	Personnel received annual review			✓	
42	262.34 / 265.16(d)	Training Documents: job titles, job description, type of training, training records			✓	
PREPAREDNESS AND PREVENTION			NA	NI	OK	DF
43	262.34 / 265.31	Maintenance & Facility Operation (must be maintained & operated to minimize possibility of release)			✓	
44	262.34 / 265.32	Required Equipment (a. Internal alarm/communication system b. External/telephone communication c. Fire extinguishers and spill control equipment d. water/foam)			✓	
45	262.34 / 265.33	Testing & Maintenance of Equipment			✓	
46	262.34 / 265.34	Communication & Alarm Access			✓	
47	262.34 / 265.35	Required Aisle Space (to allow movement of spill control and emergency equipment and inspections)			✓	
48	262.34 / 265.37	Local Authority Arrangements (police, fire, hospital) <i>Drills Exercise on Emerg Topics</i>			✓	
CONTINGENCY PLAN & EMERGENCY PROCEDURES (NA for SQG)			NA	NI	OK	DF
49	262.34 / 265.51	Contingency Plan for Facility <i>Updated Feb 2011</i>			✓	
50	262.34 / 265.52	Contingency Plan Content (SPCC plan, local arrangements, emergency coordinator, equipment list, evacuation plan, etc.)			✓	
51	262.34 / 265.53	Contingency Plan Available (on-site, local distribution)			✓	
52	262.34 / 265.54	Contingency Amendments (when regulations change, if plan fails, when facility makes changes) <i>emergency coord. & alt. being made</i>			✓	
53	262.34 / 265.55	Emergency Coordinator available			✓	
54	262.34 / 265.56	Emergency Procedures followed	✓			
USE & MANAGEMENT OF CONTAINERS			NA	NI	OK	DF
55	262.34 / 265.171	Container Condition (If not in good condition or leaking, must transfer waste or manage in some other way)			✓	

U.S. EPA Generator Checklist for Indiana

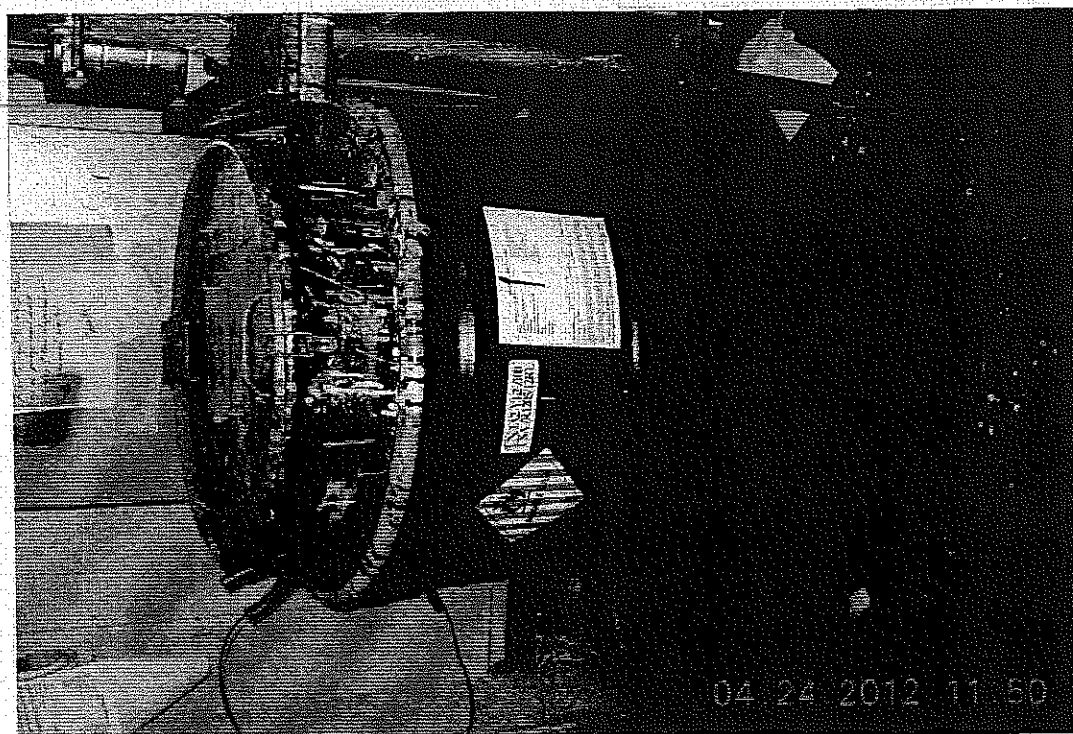
4/11/2011

56	262.34 / 265.172	Waste Compatibility with Container			✓	
57	262.34 / 265.173	Container Management (closed/manged to prevent leaks)			✓	
58	262.34 / 265.174	Inspections (weekly)			✓	
59	262.34 / 265.176	Ignitable/Reactive Waste (50 ft. set back)			✓	
60	262.34 / 265.177	Special Requirements for Incompatible Waste (physical separation/container compatibility)			✓	
LAND DISPOSAL RESTRICTIONS			NA	NI	OK	DP
61	268.3	Dilution prohibited as substitute for adequate treatment	✓			
62	268.7	Waste Analysis, Recordkeeping (LDR Notifications: waste code, whether it is a wastewater or non-wastewater, waste constituents to be monitored if monitoring will not include all regulated constituents, subcategory if applicable, and manifest number.)			✓	
63	268.7 (a)(4)	Treatment in 90-day tanks/containers requires waste analysis plan and testing frequency, filed with Regional Administrator (IDEM), certification of shipment, retained copies on-site (5 yrs.), notifications include: EPA ID #, treatment standards with 5 letter code, and manifest number	✓			
64	268.7(a)(7)	Notifications must be kept on-site for five (5) years			✓	
65	268.9	Listed and characteristic waste codes assigned for listed waste exhibiting characteristic			✓	
66	268.42	Alternative treatment specified for lab packs, mixed waste: most stringent standards	✓			
67	268.45	Treatment standards for hazardous debris	✓			
OTHER			NA	NI	OK	DP
68	IC 13-30	Release of contaminants to environment	✓			
69	IAC 3.1-7-8	Facility has waste minimization program as certified on manifest			✓	
70	IC 13-30-2-1 (9)	Does facility have any processes or activities (e.g. waste piles, incinerators, land disposal) which require a permit or interim status? If so, please identify below:	✓			

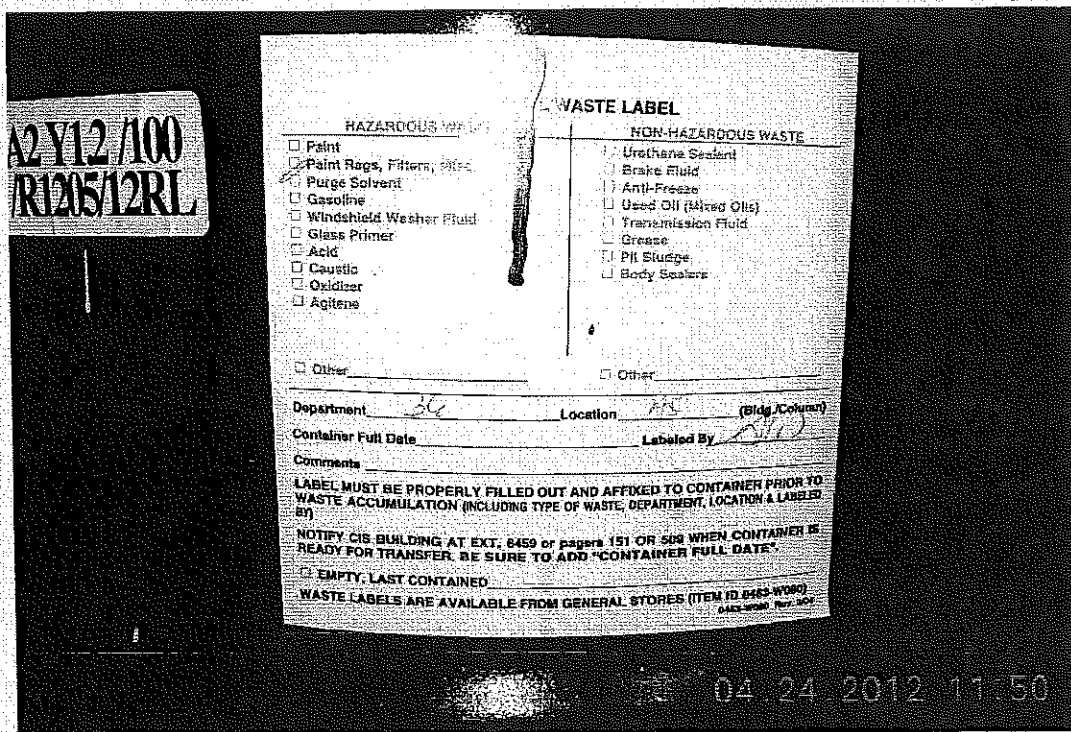
Reclaim / Purge Tank #19



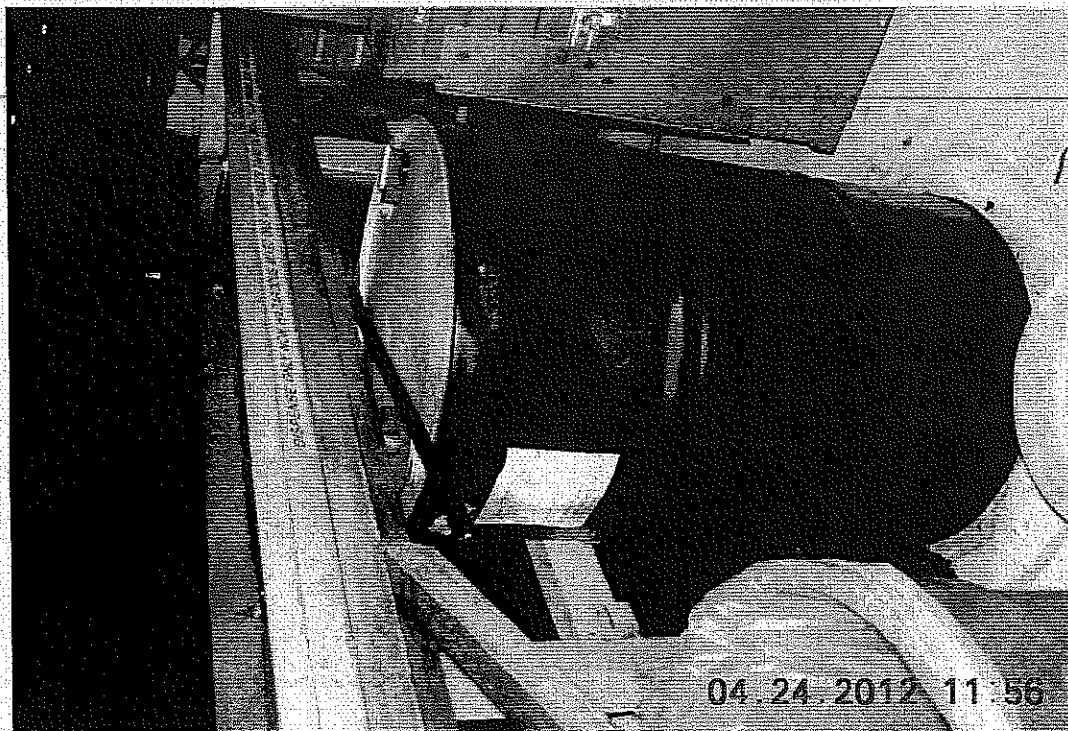
PHOTOGRAPH 1 of 7: Paint Shop Satellite Accumulation Area Signage (Date and Time on Photograph)



PHOTOGRAPH 2 of 7: Paint Shop Satellite Accumulation Container (Date and Time on Photograph)



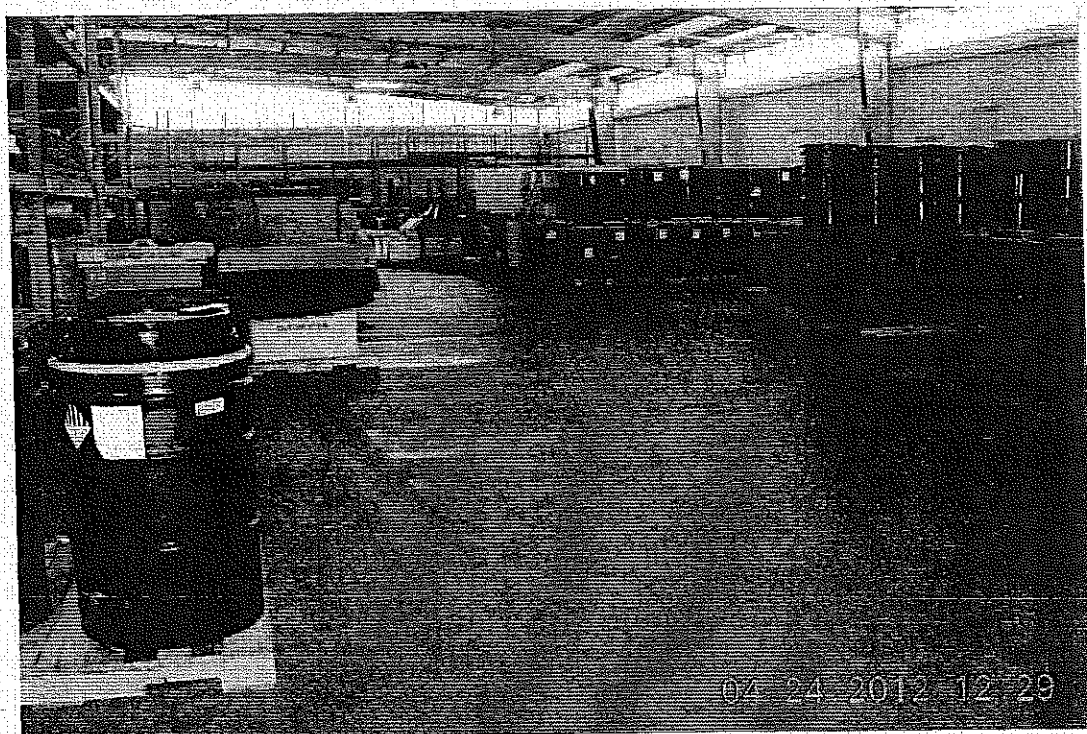
PHOTOGRAPH 3 of 7: Paint Shop Satellite Accumulation Container Label (Date and Time on Photograph)



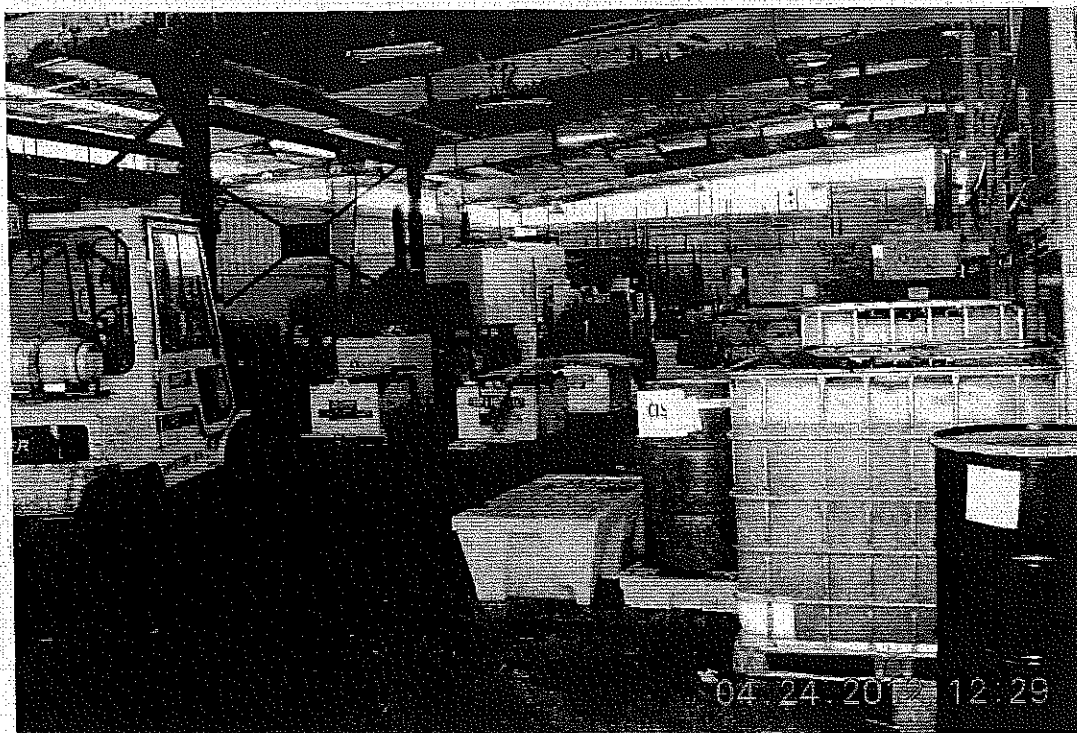
PHOTOGRAPH 4 of 7: Truck Repair satellite accumulation container (Date and Time on Photograph)

General Motors – Fort Wayne Assembly Plant – EPA ID: IND 115 304 594

Photographer D. Sharrow with Nikon Cool pix digital camera, with 8.1 megapixel resolution.



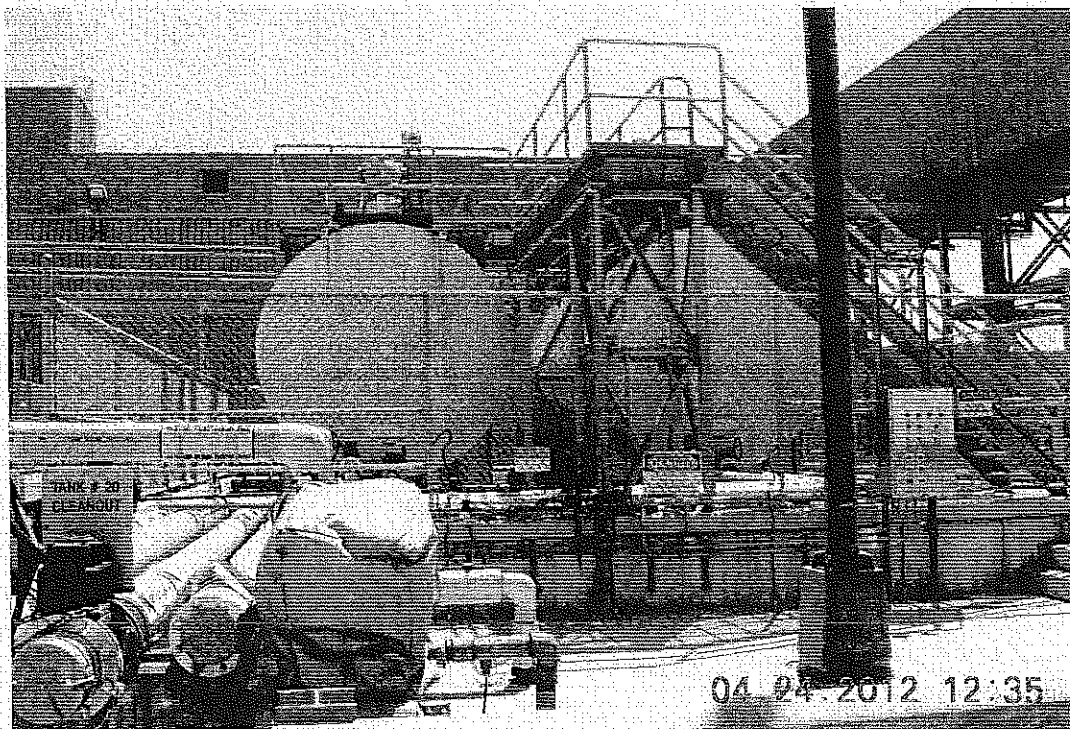
PHOTOGRAPH 5 of 7: 90 Day hazardous waste, non-hazardous waste, and used oil, universal waste and electronic waste container storage area (Date and Time on Photograph)



PHOTOGRAPH 6 of 7: 90 Day hazardous waste, non-hazardous waste, and used oil, universal waste and electronic waste container storage area (Date and Time on Photograph)

General Motors – Fort Wayne Assembly Plant – EPA ID: IND 115 304 594

Photographer D. Sharrow with Nikon Cool pix digital camera, with 8.1 megapixel resolution.



PHOTOGRAPH 7 of 7: Tank Farm Reclaim / Purge Tank No. 19 and Tank No. 20 empty and never used (Date and Time on Photograph)

Determination:

Facility Contact Form (No PA/VSI)

Facility Name: General Motors - F2 - Engine Assembly

EPA ID#: IND 43301501 Address: 12250 LaSalle Ave. Gr. Rd.

City: Riverton State: IN

Units Closed: 501 drums Date: 11/1/1988

Facility Representative: George Kiriakopoulos Phone# (260) 593-2480

Email Address: gkiriak@ford.com

Y / ☒ N Is there known soil or groundwater contamination?

Contaminants:

Y / ☒ N Has the parcel been split or was there a change in ownership? yes on north end of property - not sure when it was sold / leased

Y / ☒ N / ? Was a Phase 1 or Phase 2 report prepared in connection with a sale of the property?

Y / N Can we have a copy?

☒ Y / N Is the facility currently operating?

• When was the plant built? 1985

• What products are/were made?
pick up trucks - med. size

Kioultzopoulos



Kioultzopoulos

George Kioultzopoulos, CHMM
Environmental Manager
Worldwide Facilities Group
Environmental Services

Tel 260-673-2480
Fax 260-673-2505
Pager 800-392-3590
george.kioultzopoulos@gm.com

General Motors Corporation
Vehicle Operations
12200 Lafayette Center Road
Roanoke, IN 46783

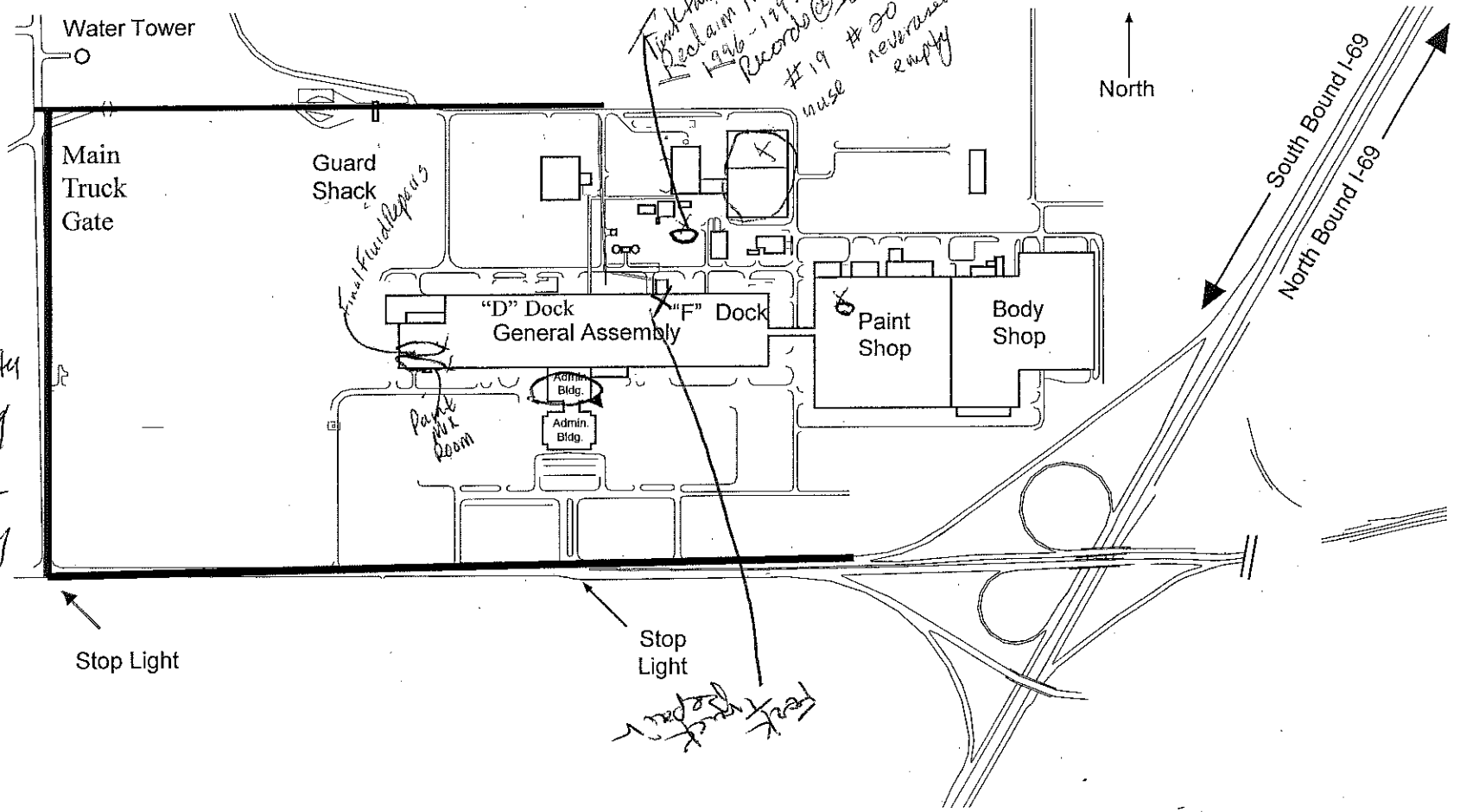
IND 115 304594

Lead from GM
by DMG
4/24/12

NAICS
336112
Light Truck or Utility Veh. Manufacturing

336612
Heavy Duty Truck Manufacturing

Not
6/4/86



To Get to the Fort Wayne Assembly Facility:

- From either North or South bound I-69 use exit 96B.
- Turn right at the second stop light.
- Turn right at the Main Truck Gate by the Water Tower.
- Stop at the security Gate to sign in.

Note: Ask Security that he needs to go to "D" Dock.

Phone numbers:

Security:	(260) 673-2345
Rob Cisz	(260) 740-2413
George Kioultzopoulos:	(260) 740-1458
Tracy Clark	(260) 905-6052

Last IDEM call 6/3/9

FIGURE 2-1 - FACILITY INFORMATION [40 CFR 112.7(a)(3)]

FACILITY INFORMATION			
Name of Facility:	Fort Wayne Assembly	Name and Address of Owner / Operator:	General Motors LLC 300 Renaissance Center Detroit, Michigan 48265
Facility Street Address:	12200 Lafayette Center Road Roanoke, Indiana 46783	Standard Industrial Classification (SIC) Code:	3711
Facility Mailing Address (if different):	N/A	Type of Industry or Manufacturing:	Automotive Assembly
Facility Phone Number(s):	(260) 673-2929 (Plant Manager)	Facility 24-hour Emergency Phone Number(s):	(260) 673-2345 or x6911
Latitude / Longitude:	040° 57' 38" N / 085° 18' 12" W		
Type of Facility:	Onshore / Non-production		
Designated Personnel Accountable for Oil Spill Prevention at the Facility:			George Kioultzopoulos
GENERAL FACILITY DESCRIPTION			
<p>The facility is in Allen County, approximately ten miles southwest of Fort Wayne, Indiana. It is located in the northwest corner of the intersection of Lafayette Center Road and Interstate 69.</p> <p>Ground breaking for the facility was in November 1984. Production began on December 8, 1986. The facility assembles full-size pick-up trucks on three shifts of production and three shifts for maintenance. The main manufacturing operations include a Body Shop, Paint Shop and General Assembly area. The facility also has an on-site Wastewater Pre-treatment Plant and Powerhouse.</p>			

FIGURE 2-2 - SITE SPECIFIC FACILITY DESCRIPTIONS [40 CFR 112.7(a)(3)]

DESCRIPTION OF SITE-SPECIFIC FACILITIES
Container Inspection and Storage (CIS) Building
<p>The Container Inspection and Storage Building, or CIS Building, is a covered, 14,000 square-foot building that is used for the storage of drums and other containers of hazardous and non-hazardous wastes. Totes and drums of used oil and empty containers are also stored in the CIS Building. The interior of the building is completely diked with peripheral floor drainage grates that flow to a blind 500-gallon sump. The blind sump, floor drainage system, and diked portion of the CIS Building allow for a containment volume of approximately 10,000 gallons, in excess of 150 percent of the largest tank volume. All liquids must be pumped manually. Used oil is pumped from totes to a tanker truck as needed. The receiving truck is typically parked partially in the building and partially on the concrete drive outside of the building. A storm water drain is located at the concrete drive. A temporary spill containment pad will be utilized at this storm water drain during used oil transfer operations. The building is equipped with an emergency communication system and portable fire extinguishers. Spill cleanup materials for leaks and spillage are maintained on the Emergency Spill Carts and in the CIS Building. Entry into the hazardous waste storage area is secured by chain link fence and locked doors. Security, Facilities Support Supervisors, Environmental Engineers and assigned CIS personnel have access to the CIS Building.</p>
Process Fluids Tank Farm
<p>The Process Fluids Tank Farm is used to store bulk hazardous materials. The Process Fluids Tank Farm is comprised of aboveground corrosion protected tanks, ranging in size from 10,000 gallons to 25,000 gallons. The Process Fluids Tank Farm is completely diked with a concrete floor and walls. The containment has a capacity of 370,000 gallons, in excess of 150 percent of the largest tank volume. All of the tanks are equipped with a visual and electronic level sensing device, which indicates the liquid level in the tank. Drainage of rainwater is controlled by a locked, manual pump (normally closed) outside the containment area, and flows to the General Motors' Wastewater Pre-Treatment Plant.</p>
Reclaim Purge Thinner Storage
<p>The two tanks in this area (No's. 19 and 20) are 18,900 gallons each and are used to store used purge thinner. The tanks are within a containment of 28,700 gallons, in excess of 150% of the volume of either tank. The unloading station has a sump with a pump that is manually controlled and operated. This area meets RCRA Hazardous Waste Tank requirements. Reclaim purge is directly piped into the tanks through a doublewall piping system. Each tank is equipped with electronic level sensing devices. The high level alarm is monitored by the fire protection system at the Security Fire Watch System.</p>
Fuel Dispensing Island
<p>The drainage from the covered fuel dispensing island is to a blind sump. Liquids collected in this sump must be manually pumped into containers for proper disposal.</p>

FIGURE 2-2 - SITE SPECIFIC FACILITY DESCRIPTIONS, CONTINUED [40 CFR 112.7(a)(3)]

DESCRIPTION OF SITE-SPECIFIC FACILITIES
Paint Treatment System (Central Sludge Process)
<p>Basecoat/Clearcoat Paint and Primer/Surfacer coatings are applied in spray booths in the Paint Building. Water, containing detackification chemicals, is recirculated to the spray booths for control of overspray from two 300,000-gallon concrete holding tanks, located in the Paint Sludge Building. The paint solids are removed from the holding tank by auto weirs and are pumped to a Palin System. The Palin System skims the floating paint solids onto a conveyor and into a rolloff container. Paint sludge is disposed at a licensed facility. Overflow water from the Paint Treatment system is automatically pumped to the GM Wastewater Pre-Treatment Plant. Bulk storage of the Paint Treatment System chemicals is in aboveground fiberglass tanks located in the Paint Sludge Building directly above one of the concrete holding tanks. Spills and leaks from either of the tanks drain into the concrete holding tank. Unloading of bulk paint treatment chemicals is performed inside the Paint Sludge building. The entire Paint Sludge Building is completely diked and drains to the concrete holding tanks.</p>
ELPO /Zircobond Thin Film Tank Farm and Process
<p>The ELPO (Electro-Deposition Priming Operation) / Zircobond Thin Film Tank Farm, located at column between columns T-14 and T-15 in the northeast corner of the Paint Building, is used to store bulk resin, and Zircobond solution. The storage area is completely diked with concrete floor and walls with a capacity of 14,140 gallons, to hold 150 percent of the largest tank volume and does not have any floor drains or drain valves. The sump in the containment area is equipped with an automatic pump (with manual override) for removal of spillage to the GM wastewater pre-treatment plant. ELPO resin is stored in an aboveground 11,000-gallon steel tank. Zircobond Thin Film solution is stored in an aboveground 6,000-gallon vinyl-ester-resin tank. Bulk storage of ELPO pigment is in 385-gallon totes located just southeast of the ELPO/Zircobond Thin Film Tank Farm. Personnel perform inspections of these areas to check equipment operation and material storage conditions at least monthly. The Zircobond and ELPO Process Systems are completely diked with concrete floors and walls to contain any spilled and/or overflow of material. Each diked area is equipped with pumps that send the material to the GM Wastewater Pre-Treatment Plant.</p>
ELPO / Zircobond Thin Film Tank Farm and Process, Continued
<p>The Zircobond System consists of nine stages. Stages One (spray cleaner), Two (dip cleaner), Three (rinse), and Four (dip) are contained together, and waste process materials are automatically pumped to the GM Wastewater Pre-Treatment Plant. The Zircobond dip operation (Stage Five) has a 120,000-gallon standby holding tank, is contained separately, and waste process material is automatically pumped to the GM Wastewater Pre-Treatment Plant. Stages Six (dip rinse), Seven (spray rinse), Eight (dip rinse), and Nine (spray rinse) are contained together, and waste process materials are automatically pumped to the GM Wastewater Pre-Treatment Plant. The ELPO Process System has a 120,000-gallon dip tank, a 120,000-gallon standby holding tank, and several dip and spray operations for removing excess ELPO from the sheet metal. Waste process materials from the ELPO System containment area are automatically pumped to the ELPO Waste System of the GM Wastewater Pre-Treatment Plant. Other hazardous materials are stored in totes, (maximum 10,000 gallons), 55-gallon drums (maximum 6,000 gallons), and two aboveground tanks (<6,000 gallons each) inside the Zircobond and ELPO process system diked containment areas. The hazards associated with the materials stored in these areas are corrosive (pH less than 2.0 or greater than 10.0) and oxidizers.</p>
Paint Shop Building Paint Mix Room
<p>The Paint Mix Room and adjacent storage rooms in the Paint Building is used as the main storage of paint and other paint related materials. Diking with a capacity of 16,000 gallons, a sufficient volume to hold in excess of 150% the volume of the largest container or tote (550 gallon maximum), provides containment for the Paint Mix Room. All liquids collected in the containment area must be manually collected into containers for proper disposal. Paint and purge is distributed to the paint spray booths from eighteen basecoat mix systems each consisting of two 175 gallon tanks, two clearcoat systems each consisting of two 650 gallon tanks, and two purge systems each consisting of two 175 gallon tanks. Primer is distributed to the primer surfacer booth from five mix systems each consisting of one 350 gallon mix tank and one 200 gallon circulating tank. All these tanks are located within the Paint Mix Room. Paint (maximum of 44,000 gallons in 325- and 550-gallon totes), purge solvent (in 350-gallon tanks), other paint-related materials (maximum 1,800 gallons in 300-gallon totes), and empty totes (maximum 20) are stored in the Paint Mix Storage Areas. Smaller containers and drums of special paints (maximum 3,500 gallons) and other paint related materials (maximum 2,500 gallons) are also stored in the Paint Mix Storage Areas.</p>

FIGURE 2-2 - SITE SPECIFIC FACILITY DESCRIPTIONS, CONTINUED [40 CFR 112.7(a)(3)]

DESCRIPTION OF SITE-SPECIFIC FACILITIES
General Assembly Building Paint Mix Room
<p>Repair paints and other paint related materials including flammable liquids, paint soaked rags and cans, are stored in drums and smaller containers in the General Assembly Building Paint Mix Room. This room is completely diked and all liquids collected in the containment area must be manually collected into containers for proper disposal. Repair paint (maximum 100 gallons) and other paint related materials (maximum 400 gallons) are stored in 55-gallon drums and smaller containers in the General Assembly Paint Mix Room. Two 220-gallon totes of purge solvent are also stored at this location.</p>
Powerhouse / Wastewater Pre-Treatment Plant Outdoor Storage Tanks
<p>Industrial wastewater is stored and treated at the GM Wastewater Pre-Treatment Plant in the following outside aboveground, open-top tanks: (4) General Wastewater holding tanks - 860,000 gallons each; (2) Cleaner Wastewater holding tanks - 250,000 gallons (Inactive); (2) ELPO Wastewater holding tanks - 320,000 gallons; (2) Clarifiers - 1,000,000 gallons each; (1) Sludge thickener tank - 84,500 gallons; (1) Equalization tank - 42,300 gallons. All tanks in the same group, i.e. general waste tanks, have common overflows that prevent overflowing of any one individual tank within each respective group. All tanks in the pre-treatment tank farm are completely contained within a concrete containment area capable of holding 150% of the largest tank volume.</p>
Powerhouse / Wastewater Pre-Treatment Plant Chemical Storage Tanks
<p>Bulk storage of wastewater treatment chemicals and skim oil is located in aboveground tanks, located in the Powerhouse/Wastewater Pre-Treatment Building. Products stored in the Powerhouse/Wastewater Pre-Treatment Building are: (1) Sodium hydroxide tank - 10,000 gallons; (1) Sulfuric acid tank - 16,000 gallons (out of service); (1) Skim oil tank - 8,000 gallons; (2) Sludge conditioning waste tanks - 6,000 gallons each; (1) Calcium chloride tank - 1,000 gallons; (2) Ferric chloride tanks - 1,000 gallons each; (1) Phosphate tank - 600 gallons; (1) Anti-foam/dispersant tank (Boiler water) - 600 gallons; (1) Corrosion inhibitor (Boilers) - 400-gallon stainless steel tote; (1) Corrosion inhibitor (Hot/Chilled Loop) - 250 gallon tote; (1) Sodium Hypochlorite tank - 2,000 gallons; (1) Sodium Bromide tank - 2,000 gallons; (1) Anti-foam (Waste Treatment) - 250 gallon tote. The sulfuric acid tank (out of service) has containment of at least 110%. No sumps/drains are located within the diked area. The sodium hydroxide area is curbed, and drains to the Wastewater Pre-Treatment System. Overflows and spillage from the remaining tanks drain to the Wastewater Treatment System. Skim oil tank is not curbed but any overflows would go to a sump for collection. The Grade Floor RO System has one tank as follows: (1) Sulfuric Acid - 130 gallons. The container for this tank is diked, and any contents would be pumped through the powerhouse sump to the GM Wastewater Pre-Treatment System.</p>
Wastewater Treatment Sludge
<p>Sludge generated from the wastewater treatment plant tanks and clarifiers is chemically conditioned by the addition of NaOH and polymers prior to dewatering in one of two plate and frame filter presses. The pressed sludge discharges into roll-off boxes. This sludge was classified as hazardous waste (F019) as of August 17, 1998, but was delisted from this hazardous waste code by the Indiana Department of Environmental Management in Final Rule 329 IAC 3.1-6-7 published on July 1, 2006. The sludge is stored in the roll-off boxes until removed for proper off-site disposal. Drains in the area of the sludge roll-off boxes are plugged (as of August 1998) and water drains to a holding tank and is pumped to the sludge conditioning tank influent. The sludge conditioning tank area drains to the holding tank and is pumped to the sludge conditioning tank influent.</p>

FIGURE 2-2 - SITE SPECIFIC FACILITY DESCRIPTIONS, CONTINUED [40 CFR 112.7(a)(3)]

DESCRIPTION OF SITE-SPECIFIC FACILITIES
Cooling Tower Chemical Storage Tanks
Bulk storage of the cooling tower water treatment chemicals located in the cooling tower pump house is diked or curbed to drain to the GM Wastewater Pre-Treatment System. The following products are stored in the pump house: (1) Corrosion and scale inhibitor - 3,000 gallons fiberglass tank; (1) Sodium Bromide - 600 gallons plastic tote. There are also 2 additional storage tanks located on the south side of the cooling tower: Both of these tanks are curbed and the contents of the containment are sump pumped to the GM Wastewater Pre-Treatment System. The details of the tanks are as follows: (1) Sodium Bromide - 1,000 gallons; (1) Sodium Hypochlorite - 1,000 gallons.
Body Shop Cooling Tower Chemical Storage
The chemicals stored at the Body Shop Cooling Tower are in plastic drums on secondary containment pallets.



Updated SPCC contact list

matt.arbuckle

to:

Diane Sharrow

05/04/2012 01:50 PM

Hide Details

From: matt.arbuckle@gm.com

To: Diane Sharrow/R5/USEPA/US@EPA

History: This message has been replied to.

1 Attachment



SPCC Udated Notification with Matt.pdf

In response to your request during your inspection of our facility on April 24 for an updated contact list, please find attached update.

Thank You,

Matt Arbuckle

Environmental Engineering

317-281-5408 (c)  matt.arbuckle@gm.com

 General Motors Fort Wayne Assembly 

Nothing in this message is intended to constitute an electronic signature unless a specific statement to the contrary is included in this message.

Confidentiality Note: This message is intended only for the person or entity to which it is addressed. It may contain confidential and/or privileged material. Any review, transmission, dissemination or other use, or taking of any action in reliance upon this message by persons or entities other than the intended recipient is prohibited and may be unlawful. If you received this message in error, please contact the sender and delete it from your computer.

FIGURE 3-2 - NOTIFICATIONS AND TELEPHONE NUMBERS

*Represents after-hours telephone numbers

CONTACT	CONTACT NUMBERS	TIME/PERSON CONTACTED
INTERNAL FACILITY CONTACTS		
IMMEDIATE Emergency Response Notification		
Ft. Wayne, Security Main Console	(260) 673-2345 or x6911 (Office)	
Facility Support Supervisor (all shifts) On-Scene Incident Commanders	(260) 673-2068 (Office) 440, 442, 445, 446, 449, 489, 490, 491, 501 Nextel (Pager)	
Paint Support Supervisor (all shifts) On-Scene Incident Commanders	(260) 673-2771 (Office) 684, 685, 279 (Pager)	
Powerhouse Supervisors (all shifts) On-Scene Incident Commander	Control Room (260) 673-2111 (Office)	
Facility Response Coordinator(s)		
Kioulizopoulos, George Environmental Manager 14707 Heron Lake Crossing Fort Wayne, Indiana 46814	(260) 673-2480 (Office) (260) 740-1458 (Mobile) 437 (Nextel) (Pager) (260) 438-3984* (Home)	
Arbuckle, Matt Sr Environmental Engineer 6849 W Maple Grove Rd Huntington, Indiana 46750	(260) 673-2662 (Office) (317) 281-5408 (Mobile) 438 (Nextel) (Pager) (260) 673-2505 (Fax)	
Emergency Support Personnel		
Baker, Gordon Security Chief	(260) 673-2002 (Office) 526 (Nextel) (Pager)	
Hubbard, Kevin Fire Chief	(260) 673-2007 (Office) 527 (Nextel) (Pager)	
Minkosky, Deb Security Safety Supervisor	(260) 673-2009 (Office) 528 (Nextel) (Pager)	

PROFILE

Section J - Generator Certification

1. GENERATOR CERTIFICATION STATEMENT:

I hereby certify that as an authorized representative of the generator named herein, to the best of my knowledge all information submitted in this and all attached documents is true and accurate. I certify that a sample (if any) representative of the waste described herein was collected and analyzed according to the methods on the forms submitted and all known and/or suspected hazardous compounds have been included in the documentation.

Are the transportation or disposal services to be performed by ESOI subject to any prevailing wage requirements? ☐ Yes ☒ No

2. GENERATOR SIGNATURE:

Jennifer Dluzak
Name (Printed or Typed)

Environmental Engineer
Title

GM
Company

3/31/09
Date

Section K - Envirosafe Site Use Only

- | | |
|-----------|--|
| 01. _____ | Schedule initial bulk shipment, 5 or more shipments/day, all containerized & all treatment, first stab. Approx. 15 yards |
| 02. _____ | Profile number must appear on each manifest required by EPA or DOT; ERC Document, phone, route information |
| 03. _____ | Generator must provide annual updated analysis; Generator retest if waste changes due to modifications to process, etc |
| 04. _____ | Generator must provide 40 CFR 262.11 updated analysis _____ and annually thereafter |
| 05. _____ | pH of a 10% slurry of waste in distilled waste must be at least _____ But less than _____ by ESOI methods |
| 06. _____ | Flash Point of incoming material must be _____ °F of greater by ESOI methods |
| 07. _____ | Annual volume ≥200 ton subject to OEPA WMA program; Acceptance ends _____ Initial due OEPA _____ |
| 08. _____ | Waste temperature acceptance requirements (≥100°F always OK). Odoriferous waste may not be acceptable (sample) |
| 09. _____ | LDR Notification-Certification Required; one-time must accompany initial shipment: |
| 10. _____ | No unauthorized materials or free liquids in bulk loads |
| 11. _____ | Waste must contain sufficient moisture to suppress dust |
| 12. _____ | Prohibition on mixing loads in same shipping container |
| 13. _____ | Waste billed by cubic yard if <2000 pounds per yard |
| 14. _____ | Material solid, non-flowable & penetrometer standard |
| 15. _____ | Miscellaneous debris 3 feet dimension limit |
| 16. _____ | Metal drums <800 pounds unless authorized herein |
| 17. _____ | Palletized boxes acceptance requirements |
| 18. _____ | Woven cloth bags acceptance requirements |
| 19. _____ | Stencil profile number on top & side each container |
| 20. _____ | Heat or gas in contact with water requirements |
| 21. _____ | Caustic may not heat & exceed 60% (w/w) |
| 22. _____ | Total/Claussen cyanide (#250) & sulfide (#500) limit |
| 23. _____ | PCB concentration limit requirements |
| 24. _____ | Non-leaking PCB ballasts & capacitors acceptance |
| 25. _____ | ESOI may request test or impound to verify LDRs |
| 26. _____ | ESOI may treat debris by alternate 268.45 tech std. |
| 27. _____ | Off-Spec waste stabilization mix design price adjust. |
| 28. _____ | Narrative description for incinerator wastes |
| 29. _____ | Conditions for acceptance of labpacks |
| 30. _____ | Conditions for asbestos 40 CFR 261 Subpart M |

Name

Title

Date

If transportation for this waste is provided by ESOI, then ESOI's standard technical requirements for transportation are applicable.

Section L - Regulatory Agency Use Only

1. ACCEPTANCE STATUS:

☐ Accepted (ACP)

☐ Conditional (CON)

☐ Withheld (WHO)

☐ Acceptance Denied (DNY)

2. CONDITIONS FOR ACCEPTANCE OR REASONS FOR DENIAL:

Name

Title

Date

Agency

FIGURE 3-2 - NOTIFICATIONS AND TELEPHONE NUMBERS

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Powerhouse Supervisors (all shifts) On-Scene Incident Commander	Control Room (260) 673-2111 (Office)	
Facility Response Coordinator(s)		
Kioultzopoulos, George Environmental Manager 14707 Heron Lake Crossing Fort Wayne, Indiana 46814	(260) 673-2480 (Office) (260) 740-1458 (Mobile) 437 (Nextel) (Pager) (260) 438-3984* (Home)	
McFall, Michael Environmental Engineer 3912 Eastern Drive Anderson, Indiana 46012	(260) 673-2662 (Office) (260) 249-6493 (Mobile) 438 (Nextel) (Pager) (765) 649-2646 (Home) (260) 673-2505 (Fax)	
Emergency Support Personnel		
Baker, Gordon Security Chief	(260) 673-2002 (Office) 526 (Nextel) (Pager)	
Hubbard, Kevin Fire Chief	(260) 673-2007 (Office) 527 (Nextel) (Pager)	
Minkosky, Deb Security Safety Supervisor	(260) 673-2009 (Office) 528 (Nextel) (Pager)	

FIGURE 3-2 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*Represents after-hours telephone numbers

CONTACT	CONTACT NUMBERS	TIME/PERSON CONTACTED
INTERNAL FACILITY CONTACTS		
Emergency Support Personnel		
Logomasini, Charles Safety Supervisor	(260) 673-2258 (Office) 534 (Nextel) (Pager) (260) 434-1326* (Home)	
Glass, Randi Regional Industrial Hygienist	(260) 673-3995 (Office) (260) 740-7771* (Mobile) 653 (Nextel) (Pager)	
Cisz, Robert Resource Manager	(260) 673-2894 (Office) (260) 740-2413* (Mobile) 503 (Nextel) (Pager)	
McCullough, Heather Chemical Manager	(260) 673-2065 (Office) (260) 740-7250* (Mobile) 506 (Nextel) (Pager)	
Site Management		
Glinski, Michael Plant Manager	(260) 673-2929 (Office) (260) 437-0848 (Mobile) 1 (Nextel) (Pager)	
Andreen, Steve Manufacturing Engineering Manager	(260) 673-2455 (Office) 110*1075*11 (Nextel) (Pager) (616) 648-8937 (Home)	
Kaszowski, Mark Facility Area Manager	(260) 673-2258 (Office) 14 (Nextel) (Pager) (260) 432-7026* (Home)	
Shenefield, David Site Utilities Manager	(260) 673-2110 (Office) (260) 410-6732* (Mobile) 439 (Nextel) (Pager)	

FIGURE 3-2 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

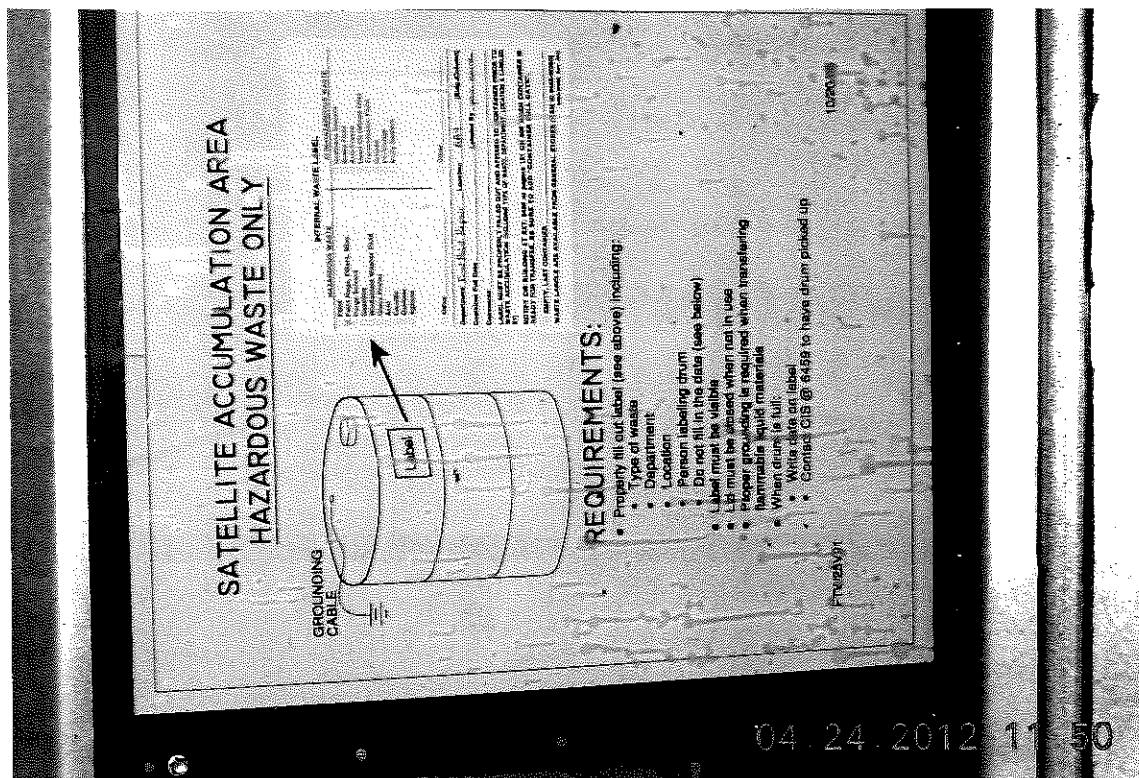
*Represents after-hours telephone numbers

CONTACT	CONTACT NUMBERS	TIME/PERSON CONTACTED
INTERNAL FACILITY CONTACTS		
Corporate Legal Counsel		
Fitzpatrick, Laura Attorney - GM 300 GM Renaissance Center MC 482-C24-D24 P.O. Box 300 Detroit, MI 48265-3000	(313) 665-4881 (Office) (313) 410-8971 (Mobile)	
Regional Management		
Schoonmaker, Bill WFG Environmental Services, Regional Manager 105 GM Drive Bedford, IN 47421	(812) 279-7308 (Office) (812) 276-2391* (Mobile)	
EXTERNAL RESPONSE RESOURCES		
Spill Response Contractors		
Weaver, Mark President, Environmental Remediation Services, Inc. 4010 Option Pass Fort Wayne, IN 46818	(260) 489-7062 (Office)	
Local / State Emergency Services		
Patnoudé, Don Fire Chief, Southwest Allen County Fire District 12912 Indianapolis Road Yoder, IN 46798	(260) 747-2938 (Office)	
Fries, Kenneth Sheriff, Allen County Sheriff's Department 715 S Calhoun St., Room 101 Fort Wayne, IN 46802	(260) 449-3000* / (260) 449-7535 (Office)	
Robbins, Lt. Gary Indiana State Police (FW District 22) 5811 Ellison Road Fort Wayne, Indiana 46804	(260) 432-8661 (Office)	
Reynolds, Michele Director Emergency Services, Lutheran Hospital 7950 West Jefferson Boulevard Fort Wayne, IN 46804	(260) 435-7219 (Office)	
REPORTING REQUIREMENTS FOR OIL SPILLS		
IMMEDIATE (no later than 15 minutes of knowledge of the release)		
National Response Center Duty Officer (USCG) 400 Seventh Street, SW Washington, DC 20004	(800) 424-8802* (Office)	

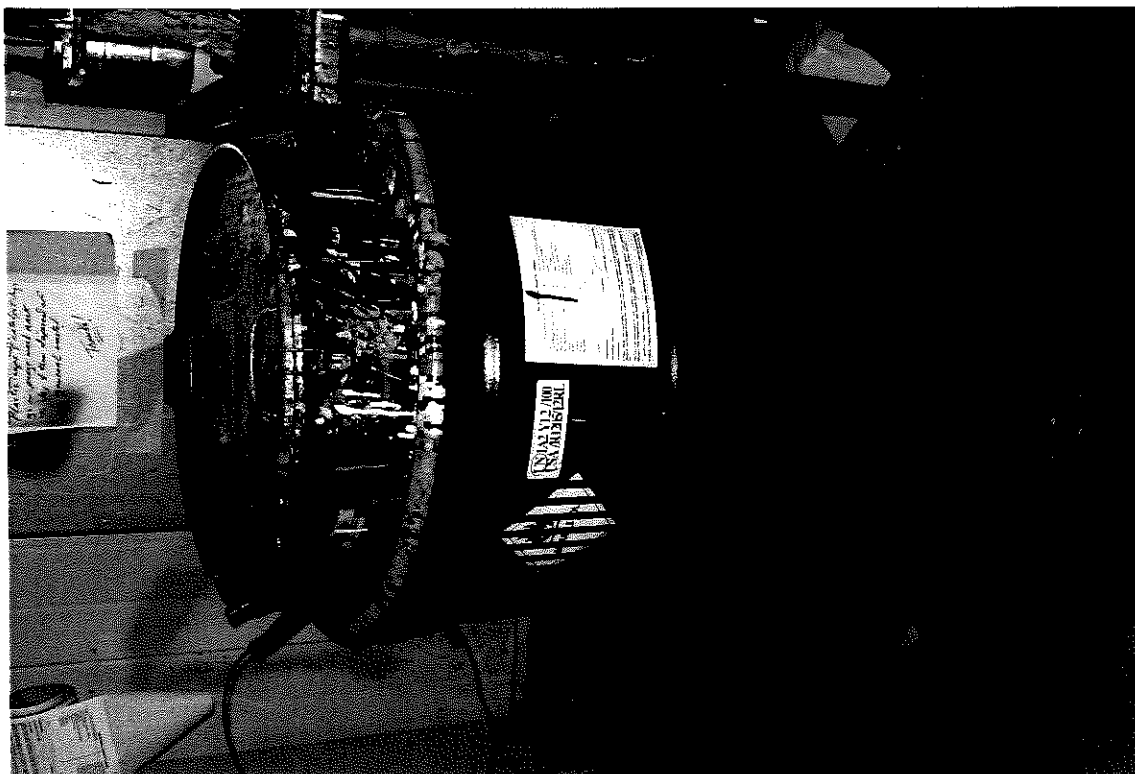
FIGURE 3-2 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*Represents after-hours telephone numbers

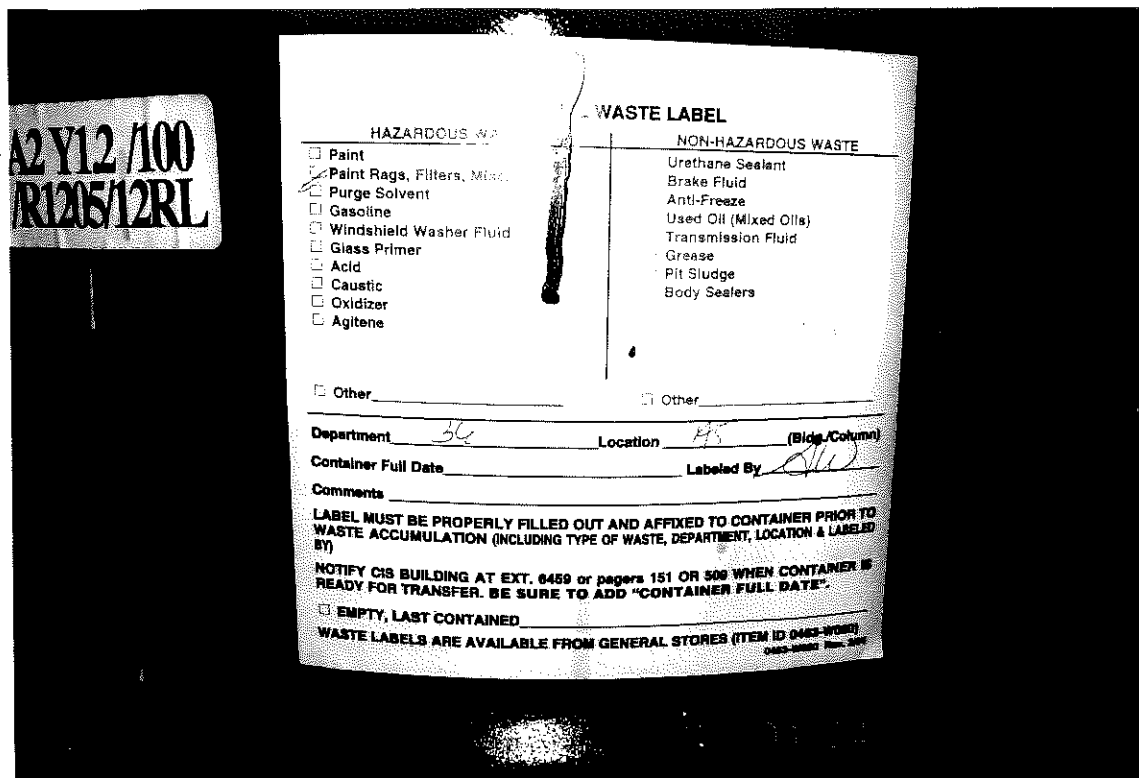
CONTACT	CONTACT NUMBERS	TIME/PERSON CONTACTED
REPORTING REQUIREMENTS FOR OIL SPILLS		
IMMEDIATE (no later than 15 minutes of knowledge of the release)		
Indiana Department of Environmental Management Emergency Response Branch 100 North Senate Avenue Indianapolis, IN 46204	(888) 233-7745 (in state) (Office) (317) 233-7745* (out-of-state) (Office)	
For Spills Likely to Travel Off-Site		
Mayers, Lori Chair, Allen County LEPC 7602 Patriot Crossing Fort Wayne, IN 46816	(260) 439-8300 [Homeland Security] (Office)	
U.S. EPA Region V Regional Response Center 230 South Dearborn Chicago, IL 60604	(312) 353-2318* (Office)	
For Spillage of Contaminants to Sanitary Sewer		
Stopher, Brenda Industrial Pretreatment Coordinator, Water Pollution Control Plant (POTW) 2601 Dwenger Avenue Fort Wayne, Indiana 46803	(260) 427-6053 (Spill-Desk), (260) 740-1971 (Spill-Cell), (260) 427-2421 (7am-4pm) (Office)	



PHOTOGRAPH 1 of 7: Paint Shop Satellite Accumulation Area Signage (Date and Time on Photograph)



PHOTOGRAPH 2 of 7: Paint Shop Satellite Accumulation Container (Date and Time on Photograph)



PHOTOGRAPH 3 of 7: Paint Shop Satellite Accumulation Container Label (Date and Time on Photograph)



PHOTOGRAPH 4 of 7: Truck Repair satellite accumulation container (Date and Time on Photograph)



PHOTOGRAPH 5 of 7: 90 Day hazardous waste, non-hazardous waste, and used oil, universal waste and electronic waste container storage area (Date and Time on Photograph)



PHOTOGRAPH 6 of 7: 90 Day hazardous waste, non-hazardous waste, and used oil, universal waste and electronic waste container storage area (Date and Time on Photograph)



PHOTOGRAPH 7 of 7: Tank Farm Reclaim / Purge Tank No. 19 and Tank No. 20 empty and never used (Date and Time on Photograph)

